

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

United States of America
v.

Prince Obambo-Boboya
a/k/a "Prince Obambo"

Case No. 5:19-MJ-2091-RN.

Defendant(s)

FILED

SEP 9 2019

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY  DEP CLK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 09/11/2014 & 08/20/2016 in the county of Wake in the
Eastern District of North Carolina, the defendant(s) violated:

Code Section

18 U.S.C. § 1015(f)

Offense Description

The defendant, did knowingly make a false claim of United States citizenship in order to register to vote in violation of Title 18 United States Code, Section 1015(f).

This criminal complaint is based on these facts:

please see attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

Jahaira Torrens, SA, HSI

Printed name and title

Date: 9/9/2019 9:33 am

City and state: Raleigh, North Carolina



Judge's signature

Robert T. Numbers II, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

AFFIDAVIT

1. I, Jahaira Torrens (hereinafter “your affiant”), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties, I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately ten years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA), and I am a member of the Document Benefit Fraud Task Force (DBFTF). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal complaint against Prince Obambo-Boboya, also known as “Prince Obambo” (hereinafter “OBAMBO”) for knowingly making a false claim of United States citizenship in order to register to vote, in violation of Title 18 United States Code, § 1015(f).

3. Because this affidavit is being submitted for a limited purpose, your affiant has not included details of every aspect of this investigation. Your affiant is

thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

4. A search of the Homeland Security Investigation's databases revealed Alien Registration File A079 255 164 is assigned to OBAMBO and revealed the following information:

- a. OBAMBO is a citizen and national of the Democratic Republic of the Congo.
- b. OBAMBO was born on XXX, XX, 1990, in Brazzaville, Congo.
- c. On August 18, 2004, OBAMBO entered the United States at New York, New York as an Asylee, based on an approved refugee/asylee relative petition, submitted on his behalf, by OBAMBO'S father.
- d. On November 24, 2009, OBAMBO'S immigration status was adjusted to that of a Lawful Permanent Resident, based on an approved application to register permanent residence or adjust status submitted by OBAMBO.

5. On September 11, 2014, OBAMBO applied to register to vote in North Carolina. Your affiant has reviewed the North Carolina voter registration application that has been completed by OBAMBO and is dated and signed under penalty of perjury by OBAMBO on September 11, 2014. The voter registration application form is checked "yes" to the question "Are you a citizen of the United States of America"? North Carolina State Board of Elections (NCSBOE) records indicate that this form was processed by the NCSBOE's on September 18, 2014, and OBAMBO was assigned

a polling station in Wake County, within the Eastern District of North Carolina. At the time OBAMBO completed the voter registration form, OBAMBO listed his address at Calumet Drive, Raleigh, North Carolina.


6. On August 20, 2016, OBAMBO again applied to register to vote in North Carolina. Your affiant has reviewed the North Carolina voter registration application form that has been completed by OBAMBO and is dated and signed under penalty of perjury by OBAMBO on August 20, 2016. The voter registration application form is checked “yes” to the question “Are you a citizen of the United States of America”. NCSBOE records indicate that OBAMBO was assigned a polling station in Wake County, within the Eastern District of North Carolina. At the time OBAMBO completed the voter registration form OBAMBO listed his address at Byrum Street, Cary, North Carolina.

7. On March 18, 2019, OBAMBO filed an Application for Naturalization (N-400). In the application, OBAMBO, under penalty of perjury stated that he had never falsely claimed to be a United States citizen. This application is currently pending. At this time, there is no record that OBAMBO is a United States citizen or meets the criteria for United States citizenship through derivation.

8. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Prince Obambo-Boboya, also known as “Prince Obambo” is in fact guilty of making a false claim of United States citizenship, in order to register to vote, in violation of Title 18, United States Code, Section 1015(f). Your

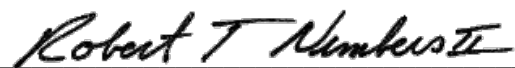
affiant respectfully asks that the Court issue a warrant ordering his arrest for such crime.

Further, your affiant sayeth not.



Jahaira Torrens
Special Agent
Homeland Security Investigations

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this written affidavit.
Dated: September 9, 2019



Robert T. Numbers, II
United States Magistrate Judge